Turning first to the rejection of claims 7 and 20 under 35 USC §112, second paragraph, the Examiner identified a minor informality in each of the claims 7 and 20 which resulted in the rejection. These informalities have been addressed in the above amendments to the claims. Thus, the Examiner is respectfully requested to reconsider and withdraw the rejection of claims 7 and 20 under 35 U.S.C. §112, second paragraph.

Claims 1-20 have been rejected under 35 USC §112, first paragraph, as containing subject matter which was not described in the specification in such a way as to enable one skilled in the art to make and/or use the invention. Specifically, the Examiner contends that the claims call for a knowledge integration apparatus or method step for performing such knowledge integration but that the specification fails to recite sufficient details so as to enable one skilled in the art to make or use such a knowledge integration function. The Examiner further contends that the specification discloses the desired functions and functionality of the knowledge integration apparatus or method step but does not provide those elements which would allow one skilled in the art would make or use such knowledge integration function without undue experimentation. Applicants respectfully traverse this rejection of claims 1-20 under 35 USC §112, first paragraph.

Initially, Applicants note that the invention lies with the identification of specific functionality (desired functions) which, when incorporated or combined with known knowledge management tools or resources, enables the integration of data management tools and improves the management and utility of the knowledge contained within the tools. The specification fully identifies and, consistent with the Examiner's statement, describes the desired functionality of the knowledge integration application. The invention as claimed is generally directed to a knowledge integration system that includes the desired functionality of managing the transfer of the information between a document source and a data source in a manner which allows the integration of analytical data from the data source with documents in the document source and provides for automatically updating the

information integrated with the documents when the corresponding information is changed in the data source. The Applicants submit that having fully identified and described the desired functionality, one skilled in the art would readily be able to implement such functionality without undue experimentation.

Applicants respectfully remind the Examiner that the burden of establishing a reasonable basis to question the enablement provided in the specification falls on the Examiner. The Examiner must provide a rational basis as to why the specification does not (or why the Examiner doubts the objective truth of the statements within the specification that teach) the manner and process of making and using the claim invention to one of ordinary skill in the art without undue experimentation.

Applicants submit that the Examiner has failed establish a prima facie case of nonenablement. The Examiner has failed to provide a rational basis to question the enablement provided. The Examiner contends that the Applicants have disclosed the desired functions and functionality but have not provided the elements which would one to make or use the invention. However, as noted above, the invention lies in inclusion of the functionality and that one skilled in the art would readily be able to implement such functionality without undue experimentation.

The specification clearly describes and provides examples of information management applications including document management systems, imaging management systems and workflow management software. The specification also fully identifies and, consistent with the Examiner's statements, describes the desired functionality of the knowledge integration application to facilitate the management of information contained within the information management applications; describes how the functionality interacts with the information management applications; and provides a narrative description of various features of the present invention. The specification also identifies an order (or stages) in which the functionality can be implemented in which the stages build upon the functionality of the previously implemented stages. Furthermore, the specification discloses and describes an

3

upper level software architecture for the knowledge integration system in such a manner as to enable one skilled in the art to make or use the claimed invention without undue experimentation. Additionally, Applicants also note that the specification contains an extensive appendix which provides but one example of implementing the desired functionality to integrate a data analysis application and a document management system and to manage the flow of information between the two. Given the extensive teaching of the specification described above, one skilled in the art of knowledge management systems and tools would readily understand the benefits and utility realized by the inclusion of such desired functionality and would be able to implement the desired functions and functionality of the knowledge integration apparatus or method step as claimed without undue experimentation.

Additionally, the Examiner must provide a reasonable explanation as to why the scope of a claim is not adequately enabled and reasons as to why the disclosure in the specification is insufficient for enablement. For example, with respect to claim 1, Applicants also note that they are not aware of any functions or functionality of the claimed knowledge integration step(s) or element(s) that are not described in the specification, including the extensive source code appendix, in such a way as to enable one skilled in the art to make or use the invention. Applicants' claim 1, in part, recites:

> "a knowledge integration application, running on a client/server system having access to the data source and the document source, for managing the flow of information between the data source and the document source, thereby enabling the integration of data and analysis results with the documents and provide links to automatically update the documents upon a change in the data or analysis results".

The specification clearly describes the functionality and requirements of such a knowledge integration application in sufficient detail to enable one skilled in the art to make or use the knowledge integration application. For example, the specification describes this knowledge integration application at page 14, line 11 through page 15,

line 13 describe such a knowledge integration application running on a client/server system access to the data source and the document source. It is submitted that one skilled in the art would readily be able to make or use an application running on a client/server system. Furthermore, an overview of the client/server model is detailed in pseudocode at page 21, lines 10 - 45. Additionally, Applicants' respectfully submit that one skilled in the art would fully understand how to implement an application in a client/server environment that has access to a data source and a document source. Building on this, one skilled in the art would readily be able to implement understand how to implement an application in a client/server environment that has access to a data source and a document source that manages the transfer of data between the sources. The specification further describes an example of one operation of a client server relationship in detail, supplemented with pseudo-code, to enable the integration of data and analysis results with the documents and provide links to automatically update the documents upon a change in the data or analysis results.

Similarly, the step in claim 9 of managing the flow of information between the first database and the document database is fully supported and detailed in the same manner identified above.

To maintain the rejection of the claims, the Applicants respectfully request that the Examiner specifically point out where in the specification, including the source code appendix, the disclosure falls short of the claimed invention, specifically identify what is missing from the teaching of specification, including the source code appendix, and state why one skilled in the art would not be able to supply the missing information without undue experimentation.

Based upon the above remarks, Applicants respectfully submit that the specification fully discloses the claimed features in sufficient detail to enable one skilled in the art to make or use the invention. Accordingly, Applicants respectfully request that the Examiner withdraw the rejection to claims 1-20 under 35 USC §112, first paragraph.

Applicants' representative respectfully requests a telephone interview at the number listed below if the Examiner has any remaining questions or issues to address after this paper. For example, if still Examiner believes one skilled in art would not be able to make or use without undue experimentation, Applicants' respectfully request a telephone interview so that the Examiner can specifically identify the functions or functionality that the Examiner believes one skilled in art would not be able to make or use without undue experimentation.

Respectfully submitted,

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